

CLAIM FORM



62-1444
Rev 2/2011

Mr./ Mrs. / Ms. / Dr.

PROPERTY DAMAGE: Attach repair estimates, invoices, proof of purchase, or supporting documents. (Do Not Send Originals).

FOOD SPOILAGE: Include a separate itemized list of each item of food spoiled and documentation of cost.

NOTE: Under California damages law you are entitled to reimbursement for the lesser of fair market value or the cost to repair your damaged property. We use the replacement cost of the item and depreciate that amount to arrive at the fair market value. You may consider consulting with your insurance carrier.

Item Description	Make/Brand	Model: Name /Number/Size	Age	Amount Claimed
(See documents - Attachment "A")				
Total Amount Claimed			(See documents - Attachment "A")	

Were you injured? ☐ Yes ☒ No If yes, please describe:

Other Losses (lost wages, lost revenue, medical expenses, etc.) Use Additional paper if necessary

(See documents - Attachment "A")

☒ PG&E Employee ☐ Other

(See attached documents - Attachment "A")

I understand that Pacific Gas and Electric Company will review all documentation in support of this claim. I certify that the foregoing is true and correct.

Relationship to Claimant Attorney

12/31/2018

CLAIM FORM**Pacific Gas and
Electric Company**

Mail To:
PG&E Law - Claims Dept.
1850 Gateway Blvd. 6th Floor
Concord, CA 94520-OR-
Email to: LawClaims@pge.com-OR-
Fax to: 925-459-7326
Helpline phone: 415-973-4548

62-1444
Rev 2/2011

PLEASE PRINT

Mr. / Mrs. / Ms. / Dr.

Last Name Verwey		First Name Philip	Spouse's Name	Work Telephone (559) 908-0836	Home Telephone ()
Business name (if claim is for business) Philip Verwey Farms				PG&E Account Number [REDACTED]	
Mailing Address - Street 19765 13th Ave					Apt. Number
City Hanford		State CA	Zip Code 93230	Email Address [REDACTED]	
Date of Incident 04/11/2018	Time AM /PM	Location of Incident (check if same as mailing address <input checked="" type="checkbox"/>)			
Description of Incident (See attached documents - Attachment "A") 					

PROPERTY DAMAGE: Attach repair estimates, invoices, proof of purchase, or supporting documents. (Do Not Send Originals).**FOOD SPOILAGE:** Include a separate itemized list of each item of food spoiled and documentation of cost.**NOTE:** Under California damages law you are entitled to reimbursement for the lesser of fair market value or the cost to repair your damaged property. We use the replacement cost of the item and depreciate that amount to arrive at the fair market value. You may consider consulting with your insurance carrier.

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Were you injured? ☐ Yes ☒ No If yes, please describe:

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(See documents - Attachment "A")

Witnesses: Name, Address, and Telephone

☒ PG&E Employee ☐ Other

(See attached documents - Attachment "A")

I understand that Pacific Gas and Electric Company will review all documentation in support of this claim. I certify that the foregoing is true and correct.

Prepared By Annie Duong

Relationship to Claimant Attorney

Signature

Date

12/31/2018



**McCORMICK
BARSTOW LLP**
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Fax (209) 524-1188

December 31, 2018

VIA E-MAIL AND U.S. MAIL

PG&E Law - Claims Dept.
1850 Gateway Blvd. 6th Floor
Concord, CA 94520

Re: Claim Forms 12/2018 – Verwey, Philip/Philip Verwey Farms
Attachment A

To Whom it May Concern:

Please be advised that this firm has been retained to represent Philip Verwey d/b/a Philip Verwey Farms, in the claim process with Pacific Gas & Electric Company (“PG&E”) for utilities services in connection with Mr. Verwey’s property. As such, direct all correspondence, inquiries, and all other documents to the undersigned. Please accept this letter as Attachment A of the Claim Form submitted concurrently.¹

A. Description of Incidents

The first incident occurred on April 6, 2018, when a high voltage power surge caused an explosion at Philip Verwey Farms, located on 13th Avenue in Hanford, California. The power surge occurred when PG&E employees/agents failed to use reasonable care when switching a circuit regulator, located approximately on 13th Avenue and Kansas Ave in Hanford, to a power line from Corcoran. The negligent conduct caused a 750+ voltage spike for approximately 30 minutes and resulted in an explosion on the property that damaged the facilities, buildings, and equipment. Mr. Verwey contracted Roman Electric, Inc. of Visalia to repair the damages from the explosion. In addition, the explosion also damaged the generator which impaired the dairy operations until repairs could be completed. After the incident, a PG&E employee/agent came to the circuit regulator on 13th Avenue to assess and repair the switch.

The second incident occurred on April 11, 2018, when another high voltage power surge caused a second explosion to the same property at Philip Verwey Farms. Again, the power surge was caused from PG&E’s employees/agents failing to exercise reasonable care when repairing the switch on 13th Avenue after the first incident and causing a second explosion. The second explosion damaged the facilities, buildings, and equipment after the repairs were made from the first explosion. After the second incident, PG&E employees/agents came back to 13th Avenue and repaired the circuit

¹ This attachment/letter is written for the sole purpose of compromise and settlement; nothing contained herein shall be deemed to be an admission nor its contents be admissible at any subsequent proceeding without the written consent of the undersigned.

regulator switching the power line from Corcoran back to the Hanford power line. Mr. Verwey contracted Roman Electric, Inc. to repair the property once again and the dairy operations were impaired until repairs could be completed.

The resulting damages would not have occurred but for the power surges from PG&E's negligent conduct on April 6, 2018 and April 11, 2018.

B. Witnesses

At this time, Mr. Verwey is aware of the following witnesses who have knowledge of the incidents on April 6, 2018 and April 11, 2018:

- a. Frank Lourenco
 Zenith Insurance Company
 PO Box 619083
 Roseville, CA 95661
 (877) 581-8237
- b. Roman Bettencourt
 Roman Electric, Inc.
 1750 S. Augusta Ct.
 Visalia, CA 93277
 (559) 651-1007
- c. Tanner Bettencourt
 Roman Electric, Inc.
 1750 S. Augusta Ct.
 Visalia, CA 93277
 (559) 651-1007
- d. John Witte, PG&E Account Representative
 N/A
 (559) 263-5908

C. Damages

The total amount of property damages incurred is \$284,462.61. The damages are based on invoices from various servicers to repair and replace the necessary equipment for the operation of the business, which are attached. The following represents a summary of the invoices and property damages:

Invoice #	Servicer	Amount
48854	Roman Electric Inc.	\$6,261.85
48856	Roman Electric Inc.	\$3,851.84
48861	Roman Electric Inc.	\$41,286.39
48857	Roman Electric Inc.	\$3,388.47
48877	Roman Electric Inc.	\$8,985.33
48876	Roman Electric Inc.	\$23,477.00
48874	Roman Electric Inc.	\$22,683.80
48853	Roman Electric Inc.	\$2,300.77
48878	Roman Electric Inc.	\$27,384.21
48859	Roman Electric Inc.	\$1,045.28
49066	Roman Electric Inc.	\$11,503.18
49067	Roman Electric Inc.	\$34,351.90
49069	Roman Electric Inc.	\$5,099.94
49070	Roman Electric Inc.	\$7,366.58
30513	Carver Pump	\$6,452.39
485684	Lawrence Tractor Co.	\$1,320.05
1387	Western Cow Comfort	\$75,561.17
	Total	\$284,462.61

In addition, Mr. Verwey suffered significant loss of revenue in the form of loss of milk production, excess beef and dead livestock, and increased operating expenses. Because of the nature of the industry, the extent of the damages could not be ascertained until the end of the fiscal year. Attached is the loss revenue statement with supporting documents from Ron Greenall, CPA of Genske, Mulder & Company. The following is a summary of the loss of revenue:

Summary of Loss	Amount
Loss of Milk Production	\$691,972.00
Excess Beef and Dead	\$256,447.00
Operating Expense	\$201,587.00
Less Insurance Reimbursement	(\$200,000.00) ²
Total	\$950,007.00

² Mr. Verwey's carrier, Zenith Insurance Company ("Zenith"), partially reimbursed Mr. Verwey for his losses and submitted its own claims to PG&E. Zenith's claims with PG&E are File # [REDACTED] and # [REDACTED]. The amount claimed herein represents Mr. Verwey's unreimbursed loss.



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PG&E Law - Claims Dept.

December 31, 2018

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In sum, our client has sustained **\$1,234,469.61** in losses and damages as a result of PG&E's negligent conduct causing the incidents that occurred on April 6, 2018 and April 11, 2018. Pursuant to PG&E's claim process, Mr. Verwey demands compensation for the same. Please provide a response within 30 days of receipt. If we do not hear from PG&E within the time period provided, we will enforce all rights and remedies available to our client.

Very truly yours,

Todd Wynkoop
Annie Duong
McCormick Barstow LLP

TW: HQD

Enclosure: 2018 Repair Invoices, 2018 Loss Revenue Statement

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